

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

ERIC BERNARD (#R-25398), a/k/a TERRELL
KING,

Plaintiff,

v.

ILLINOIS DEPARTMENT OF CORRECTIONS
and WEXFORD HEALTH SOURCES, INC.,

Defendants.

No. 20cv50412

Hon. Iain D. Johnston
Hon. Margaret J. Schneider

ERIC BERNARD (#R-25398), a/k/a TERRELL
KING,

Plaintiff,

v.

ROB JEFFRIES, ANDREA TACK, SONJA
NICKLAUS, JOHN VARGA, ANN GRANGER,
WEXFORD HEALTH SOURCES, INC.,
MONICA CARPENTER, CELIA GROSSMAN,
LACI BARLO, UNKNOWN IDOC OFFICIALS
and UNKNOWN MEDICAL STAFF
DEFENDANTS,

Defendants.

No. 20cv50413

Hon. Iain D. Johnston
Hon. Margaret J. Schneider

**DEFENDANTS' MOTION FOR ROBERT FANNING TO APPEAR AT GLOBAL PRE-
SETTLEMENT CONFERENCE VIA REMOTE MEANS**

Defendants, Illinois Department of Corrections ("IDOC"), Rob Jeffreys, Andrea Tack, Sonja Nicklaus, John Varga, Tarry Williams, Monica Carpenter, Jamie Chess, Jacob Long, Ann Ganger, Mauricio Sotelo, Mitch Wakely, Jacob Cassidy, Jennifer Hofelina, and Ashley Heffelfinger, by and through their attorney, Kwame Raoul, Attorney General for the State of Illinois, respectfully request an order allowing counsel for IDOC Chief Legal Counsel Robert

Fanning to appear at the August 25, 2025, pre-settlement conference via remote means, and in support state as follows:

1. On July 23, 2025, an order setting an in-person global pre-settlement conference before District Judge Iain D. Johnston in the Western Division of the Northern District of Illinois was set for August 25, 2025, at 1:30pm in Rockford, Illinois, in the 10 matters brought by Plaintiff. This order specifically orders the appearance of Chief Fanning at the global pre-settlement conference on August 25, 2025, at 1:30pm. Dkt. #31.

2. Chief Fanning is based out of the IDOC office in Springfield, Illinois.

3. Rockford, Illinois, is approximately 198 miles and is approximately three hours by car one way from Springfield. A round trip from Springfield to Rockford would consume the entire workday of Chief Fanning. Appearing by video would be in the best interests of the State's resources as it would allow Chief Fanning to participate in both the pre-settlement conference and continue his work in Springfield.

5. The undersigned respectfully requests that this court enter an order allowing Robert Fanning to appear remotely at the pre-settlement in Rockford, Illinois on August 25, 2025, at 1:30pm.

6. This motion is not brought for the purpose of delay. No party will be prejudiced by the granting of this motion.

WHEREFORE, Defendants Rob Jeffreys, Andrea Tack, Sonja Nicklaus, John Varga, Tarry Williams, Monica Carpenter, Jamie Chess, Jacob Long, Ann Ganger, Mauricio Sotelo, Mitch Wakely, Jacob Cassidy, Jennifer Hofelina, and Ashley Heffelfinger, respectfully request that this Honorable Court enter an order allowing counsel for Robert Fanning to appear at the August 25, 2025, settlement conference via remote means.

Date: August 18, 2025

KWAME RAOUL
Attorney General of Illinois

Respectfully submitted,
COUNSEL FOR IDOC DEFENDANTS

By: /s/
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